

COOLEY LLP
BOBBY GHAJAR (198719)
(bghajar@cooley.com)
TERESA MICHAUD (296329)
(tmichaud@cooley.com)
COLETTE GHAZARIAN (322235)
(cghazarian@cooley.com)
1333 2nd Street, Suite 400
Santa Monica, California 90401
Telephone: (310) 883-6400

MARK WEINSTEIN (193043)
(mweinstein@cooley.com)
KATHLEEN HARTNETT (314267)
(khartnett@cooley.com)
JUDD LAUTER (290945)
(jlauter@cooley.com)
ELIZABETH L. STAMESHKIN (260865)
(lstameshkin@cooley.com)
3175 Hanover Street
Palo Alto, CA 94304-1130
Telephone: (650) 843-5000

CLEARY GOTTlieb STEEN & HAMILTON LLP
ANGELA L. DUNNING (212047)
(adunning@cgsh.com)
1841 Page Mill Road, Suite 250
Palo Alto, CA 94304
Telephone: (650) 815-4131

Counsel for Defendant Meta Platforms, Inc.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

RICHARD KADREY, *et al.*,

Individual and Representative Plaintiffs,

v.

META PLATFORMS, INC., a Delaware
corporation;

Defendant.

Case No. 3:23-cv-03417-VC-TSH

DECLARATION OF JUDD LAUTER

1 I, Judd Lauter, declare as follows:

2 1. I am a Special Counsel at the law firm of Cooley LLP and am counsel to Defendant
3 Meta Platforms, Inc. ("Meta") in the above-captioned case. I have personal knowledge of the facts
4 contained in this Declaration and, if called upon as a witness, could competently testify to them
5 under oath.

6 2. Attached hereto as Exhibit 1 is a true and correct copy of excerpts from the
7 November 13 and 14, 2024 30(b)(6) deposition of Michael Clark.

8 3. Attached hereto as Exhibit 2 is a true and correct copy of excerpts from the index
9 pages for the 30(b)(6) depositions transcripts of Michael Clark. These excerpts demonstrate that
10 mitigations were discussed extensively during his many hours of on the record, and very few
11 privilege objections were made.

12 4. Based on our review of notes and emails, neither "seeding" nor any similar concept
13 was raised by Plaintiffs in the context of Meta's 30(b)(6) topics or testimony until counsel
14 questioned Mr. Clark about seeding on November 19.

15
16 I declare under penalty of perjury that the foregoing is true and correct. Executed on this
17 8th day of January 2025 at Berkeley, California

18
19
20 /s/ Judd Lauter
Judd Lauter

21
22
23 313130810